

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNIVERSITAS EDUCATION, LLC,

*Judgment Creditor,*

-against-

NOVA GROUP, INC., as trustee, sponsor and fiduciary  
of THE CHARTER OAK TRUST WELFARE  
BENEFIT PLAN,

*Judgment Debtor.*

Case No. 11 CV 1590-LTS-HBP

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the annexed affidavit of Daniel Saks and the exhibits annexed thereto; the proposed third-party complaint; the accompanying memorandum of law in support; and all of the pleadings and proceedings had herein, proposed intervenor HUG Funding, LLC (“HUG”) will move this Court, before the Honorable Laura Taylor Swain, at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York, as soon as counsel may be heard, for an Order: (a) granting HUG permission to intervene in the above-captioned action pursuant to Federal Rule of Civil Procedure 24; (b) permitting HUG to file its proposed third-party complaint; and (c) granting such other and further relief as the Court may find just and proper.

Dated: Kew Gardens, New York

March 20, 2018

LIPSIUS-BENHAIM LAW, LLP  
*Attorneys for HUG Funding, LLC*

By: \_\_\_\_\_

  
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